

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) NO. 23-cr-10186-ADB
)
 JAQUORI LYONS, et al.)

STATUS MEMORANDUM

The United States, based on communications with defense counsel for defendants Joan Avalo-Quezada, Trevon Bell, Keonte Campbell, Amos Carrasquillo, Zion Ford, Dominique Finch, Tyrre Herring, De'vonnie McDonald-Jones, Michael Riley, and Keyon Roberson, hereby submits this status memorandum as requested by the Court summarizing, for each defendant, the status of their review of discovery provided to date.¹ See ECF Dkt. No. 244.

As noted in previous filings, the primary charge in the pending case is RICO conspiracy under 18 U.S.C. § 1962(d) - all defendants are charged with RICO conspiracy. There is significant discovery associated with this charge, including

1 As of the date of the filing of this memorandum, the government has not received responses from counsel for defendants Deshawn Cirino, Rickquille McKinney, or Amani Perkins. On December 18, 2024, the Court granted defendant Jaquori Lyons' motion for new counsel; to date, new counsel has not yet been appointed.

both paper discovery and electronic discovery, including electronic evidence seized from numerous cellular phones.

The government has made nine global discovery productions as of the present date, involving several hundred written reports, electronic materials (including recorded videos and social media postings), materials related to search warrants, jail calls and related materials, materials related to financial crimes, materials related to homicide investigations, and over twenty-five phone extractions pursuant to the Protective Order so-ordered by the Court on September 24, 2024, see ECF Dkt. No. 221, as well as additional defendant-specific productions containing materials related to financial crimes given that those materials contain an extensive amount of personally identifiable information (PII).

Given the complexity and amount of discovery in the case, the defendants filed a joint motion seeking the appointment of a coordinating attorney for discovery, which the Court granted. ECF Dkt. No. 169. Recent discovery productions have been, and the remaining discovery will be, provided to the coordinating attorney for subsequent use by the defendants.

The parties continue to be involved in discussions regarding the production of discovery to defendants who are

being detained pretrial. As noted previously, the parties are reviewing the feasibility of using laptop computers for this discovery. The defendants, through their counsel, are in contact with court administrators on this issue. As detailed below, the government understands these conversations are ongoing and the issue has not yet been finally resolved. If laptop computers are to be used, the government is prepared to load discovery onto the laptop computers. In addition, as noted above, the Court has appointed a coordinating discovery attorney to facilitate the organization and production of discovery in this case.

The government will make additional discovery productions in the future, including additional law enforcement reports and materials related to various investigations. The government is in the process of obtaining legal possession of additional certain materials, including from state files. The defendants are in the process of reviewing the initial discovery productions and may make additional discovery requests based upon their review.

Finally, as set forth in previous status pleadings, to aid in the review of the discovery, counsel for the government has met with counsel for numerous defendants to review certain

significant evidentiary areas (not the government's entire potential case at trial) regarding the RICO conspiracy case against the respective defendants.

Per the Court's request, a defendant-specific summary is provided below:

1. Joan Avalo-Quezada: Counsel reports he has provided discovery to his client who is reviewing it.
2. Trevon Bell: Counsel reports that she is determining how to provide a laptop with discovery to her client at Hartford Correctional Center.
3. Keonte Campbell: Counsel reports that he is continuing to review discovery and has provided discovery to his client.
4. Amos Carrasquillo: Counsel reports that he has engaged in conversations with court administrators regarding providing discovery on a laptop to his client at Wyatt Detention Facility ("Wyatt").
5. Zion Ford: Counsel has made several specific discovery requests to which the government is reviewing and will respond accordingly.
6. Dominique Finch: Counsel reports they have had limited success in providing discovery to their client at Wyatt based on its capabilities regarding handling digital

records/drives, and that they are continuing to work with Wyatt to do so.

7. Tyree Herring: Counsel reports that her client needs discovery in Suffolk County Jail. The government has inquired of counsel as to the specific issues and is prepared to assist if possible.
8. De'Vonne McDonald-Jones: Counsel reports that he has provided his client some materials in hard-copy format and is planning to provide a flash drive containing all discovery to date that is not subject to the Protective Order. Counsel has made one specific additional discovery request which the government is reviewing and will respond accordingly. Counsel has also alerted the government that they have been unable to access or open certain files produced in discovery. The government is working cooperatively with defense counsel to resolve those issues.
9. Michael Riley: Counsel reports that his client is awaiting discovery on a laptop at Wyatt as well as certain trial transcripts.
10. Keyon Roberson: Counsel reports that this past week, they were able to resolve technical issues regarding phone extractions. Additionally, counsel reports their

involvement in ongoing discussions with court administrators regarding providing laptops loaded with discovery into Wyatt.

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

/s/ Sarah B. Hoefle
MICHAEL CROWLEY
SARAH HOEFLER
LUCY SUN
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on the below date.

December 23, 2024

/s/ Sarah B. Hoefle
SARAH B. HOEFLER
Assistant U.S. Attorney